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May 6, 2022

VIA EMAIL

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Re: 4218 Partners LLC, Case No. 19-44444-nhl (the “Bankruptcy Case”)

Dear Messrs. Nutovic, Rosen, Soloveichik, and Schwartz:

As you are aware, this firm is counsel to Maguire Ft. Hamilton LLC in the Bankruptcy Case. Reference is made to the letter dated May 5, 2022, from Mr. Pinkston, counsel to 4202 Fort Hamilton Debt LLC, regarding the real property located at 4202 Fort Hamilton Parkway, Brooklyn, New York (the “4202 Property”) filed at ECF No. 152 on the docket of Case No. 20-42438-nhl, 4202 Partners LLC.

As you are also aware, the real property located at 4218 Fort Hamilton Parkway, Brooklyn, New York (the “4218 Property”), which is property of the bankruptcy estate of 4218 Partners LLC, is contiguous to the 4202 Property.

Accordingly, please advise immediately whether, to the knowledge of your respective clients, the 4218 Property presently is used or was used any time during the pendency of the Bankruptcy Case: (i) to operate a car wash, (ii) to operate a parking business or to store vehicles, or (iii) to conduct any other undisclosed commercial activities. To the extent that your respective clients are aware of any such activities, please advise immediately whether

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they have been involved, whether as owners, principals, investors or in any other way at all, with any such activities at the 4218 Property.

For the reasons noted in Mr. Pinkston's letter, operation of a business or storage of vehicles at the 4218 Property would likewise be improper and must immediately cease.

All rights are reserved.

Sincerely,

/s/ Leslie A Berkoff

Leslie A. Berkoff

cc: M. Ryan Pinkston (via email)
Nazar Khodorovsky (via e-mail)
Kevin Nash (via e-mail)
Hon. Nancy Hershey Lord (via e-mail and CM/ECF)